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*Attorney for Objector William Thomas Haynes,
as trustee for the benefit of W Thomas and Katherine Haynes
Irrevocable Trust for the benefit of Sara L. Haynes*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE PETROBRAS SECURITIES
LITIGATION**

Case No. 14-CV-9662 (JSR)

CLASS ACTION

DECLARATION OF ANNA ST. JOHN

I, Anna St. John, declare as follows:

1. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. My business address is Competitive Enterprise Institute, 1310 L Street NW, 7th Floor, Washington, DC 20005. My telephone number is (917) 327-2392. My email address is anna.stjohn@cei.org.

3. I represent William Thomas Haynes in his capacity as the trustee of the W Thomas and Katherine Haynes Irrevocable Trust for the benefit of Sara L. Haynes, a class member in this matter.

4. A true and correct copy of *Enron: Extortion, Interrupted*, by Theodore Frank, dated January 23, 2008, and available at <https://www.nysun.com/opinion/enron-extortion-interrupted/70037> as of June 1, 2018, is attached hereto as Exhibit 1.

5. A true and correct copy of Memorandum of Points and Authorities in Support of Motion for Reconsideration Pursuant to Federal Rules of Civil Procedure 59 and 52, filed as Docket No. 119-1 in *Dennis v. Kellogg Co.*, No. 3:09-cv-01786-IEG-WMC (S.D. Cal.), is attached hereto as Exhibit 2.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 1, 2018, in New Orleans, LA.

/s/ Anna St. John
Anna St. John